

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Post-Effective Date Debtors.¹	§	(Jointly Administered)

**ORDER ALTERING AND AMENDING
ORDER ENTERED ON MAY 24, 2022
[RELATES TO DOCKET NO. 2475]**

Upon the *Emergency Motion of BP Exploration & Production Inc. to Alter or Amend May 24 Order Pursuant to Bankruptcy Rule 9023* (the “Emergency Motion”)² and upon consideration of the Emergency Motion, due and proper notice of the Emergency Motion having been provided; and it appearing that no other or further notice need be provided; and the Court having conducted a hearing (the “Hearing”) on the Emergency Motion on June 7, 2022; and upon the record of the Hearing and briefing, if any, on the Emergency Motion; and any responses to the Emergency Motion having been withdrawn, resolved, or overruled on the merits; and the Court having determined that there exists just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED** that:

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but not otherwise defined herein shall have the same meanings as ascribed to them in the Emergency Motion.

1. The Emergency Motion is **GRANTED** as set forth herein.
2. For the reasons stated herein and more fully on the record at the Hearing, the *Order* [Docket No. 2475] entered on May 24, 2022 (the “May 24 Order”) is hereby altered and amended, pursuant to Bankruptcy Rule 9023, to provide that no discovery requests, including, but not limited to, the discovery requests in ECF Nos. 1387 and 1388, may be served by QuarterNorth Energy LLC (“QuarterNorth”) against BP Exploration & Production Inc. (“BP”), as any such requests relate to the same subject matter as, and/or otherwise overlap or interfere with, the pending Arbitration Proceedings to which QuarterNorth and BP are parties, and this Court lacks subject matter jurisdiction to order Rule 2004 discovery by one non-debtor party against another non-debtor party with respect to claims that have no conceivable effect on the post-confirmation estate being administered in bankruptcy.

Signed: _____, 2022

HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE